

PO Box 4537  
1750 Emmitsburg Road  
Gettysburg, PA 17325

Phone: 717-334-6777  
Fax: 717-334-0854

**Agrotors Inc**

# Fax

To: MR Deepak Joshi From: Bob Pierce  
Fax: (202) 314-6349 Date: 3-11-05  
NUMBER OF PAGES INCLUDING COVER PAGE 3

Urgent ☒ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle

•Comments:



P.O. Box 4537 1750 Emmitsburg Road  
Gettysburg, PA 17328  
717 334-6777  
FAX • 717 334-0854

March 11, 2005

Mr. Deepak Joshi  
Lead Aerospace Engineer (Structures)  
National Transportation Safety Board  
Room 5235  
490 L'Enfant Plaza, SW  
Washington, DC 20954

FAX (202) 314-6349

Email [joshid@ntsb.gov](mailto:joshid@ntsb.gov)

Re: NTSB NPRM 427  
49 CFR 830

Dear Mr. Joshi,

Agrotors operates a 16-helicopter fleet, which perform a variety of specialized utility helicopter operations. We safely fly approximately 7,500 hours each year, and employ 75 people.

Agrotors would like to go on record as being vehemently opposed to modifying the current definition of *substantial damage* in 830.2 by removing reference to ground damage to helicopter rotor blades from the list of exclusions. Our reasons for opposition are as follows.


- It has always been the responsibility of the owner operator to ensure that the aircraft is in a condition that is safe for flight prior to signing the maintenance release. However the damage may occur, damage limits to tailrotor and mainrotor blades are clearly established by the manufacture. If minor blade damage is discovered and through inspection and they are deemed serviceable in accordance with the manufactures limits, than the aircraft can be considered to be in a condition that is safe for flight. If they are deemed unserviceable when damaged beyond acceptable limits, they must be removed, sent to an approved blade shop for repair, or replaced with a serviceable part.

- The NPRM states that "ANY damage to main or tailrotor blades – regardless of how it occurs- will likely adversely affect the performance of the aircraft and, if so, should be considered substantial damage" is ludicrous at best. To attempt to equate the serviceability standards of helicopter blades to airplane wings is absurd. Unlike the wings of an airplane, rotor blades are routinely and safely removed, inspected and reinstalled on helicopters.
- The economic impact caused by the increase in reported helicopter accidents would create such a negative perception of safety on the helicopter industry that just would not be accurate. Pilots, mechanics, operators and manufactures and the industry as a whole would suffer greatly.
- It is difficult now, with current NTSB accident investigation resources, to determine final cause on recent aviation accidents within a reasonable amount of time. It would appear unlikely that the NTSB would have sufficient resources to cope with the additional investigation demand. The financial impact on the operator could be devastating. It would force the operator to remove his aircraft from service as a revenue generating resource until it is investigated and released by the NTSB.

For the reasons stated above, Agrotors fails to see the logic to bring events involving any damage to main or tailrotor blades within the definition of an accident, and make them reportable events with no reasonable expectation of enhancing safety. Current inspection procedures and airworthiness standards that are being followed industry wide provide the needed justification that does not necessitate the change the NTSB is seeking.

Thank you for allowing Agrotors to comment on this issue.

Respectfully Submitted,



Robert L. Pierce  
Vice President